

OnlineDisclosures Privacy policy

This policy is applicable to individuals who are providing their personal data for the purpose of carrying out criminal records checks as required by the Requesting Organisation.

In this notice:

‘You’ and ‘your’ means the person(s) accessing this website and making an application.

‘We’, ‘us’ and ‘our’ means First Advantage Europe Ltd, No 1 Wilford Business Park, Ruddington Lane, West Bridgford, Nottingham NG11 7EP, United Kingdom (“First Advantage”)First Advantage Europe Limited.

The ‘Requestor’ or ‘Requesting Organisation’ means the company who is requesting the check, in most cases this may be Your Employer or potential employer.

This policy was last updated on 07th February 2023

Introduction

First Advantage acts as a Data Processor on behalf of the Requesting Organisation. This notice applies to the actions carried out by First Advantage on behalf of the Requesting Organisation only and may not provide full details of what the Requestor intends to do with Your personal data.

All Requesting Organisations are required to abide by the DBS/DS Code of Practice, the General Data Protection Regulation (GDPR), the UK GDPR and have a policy for the recruitment of ex-offenders and a policy for secure storage, handling, use, retention and disposal of Disclosure Certificates and Disclosure Information. Please refer to the privacy notice or contracts provided to You by the Requesting Organisation for further details on how they may use Your data.

Data we collect

We will collect the information you provide in Your application in order to complete the checks as directed by the Requesting Organisation. All information requested is used solely for the purpose of producing a Disclosure and is collected, stored and processed in accordance with UK GDPR and GDPR. We will treat your personal information as confidential and we will not disclose it to any third party except: (i) with your prior agreement; (ii) as necessary for providing our Criminal Record online service to you; or (iii) as required by law. The type of information collected will depend on the type of check requested and the documents You have available.

All information is stored in a secure environment, compliant with ISO27001. All information for a Disclosure is encrypted and submitted to and from DBS via secure government pathway.

Why we collect your data

First Advantage acts on the instructions of the Requesting Organisation and will use the data You provide in Your application to carry out criminal records checks as directed by them.

Third Parties

We will send Your data to either Disclosure Scotland or the Disclosure & Barring Service to complete a criminal records check.

For information on Your rights as an applicant and for information on how Your details will be used by the Disclosure & Barring Service, please visit:

www.gov.uk/DBS.

<https://www.gov.uk/government/publications/dbs-privacy-policies>

You will be asked to provide identity documentation in order to validate Your identity. If you are unable to provide the Route 1 documentation, as prescribed by the Disclosure and Barring Service (also known as DBS), We will validate Your identity by checking the personal data which You supply against the details held about You on other databases which we have access to, such as those held by credit reference agencies (CRAs) e.g., Equifax. The Identity Verifier will notify You again before this happens.

Checking your details with Equifax is purely for the purpose of an identity check. This is known as a soft search and it is not a credit check. You can have unlimited soft searches on your credit report without it having any impact on your credit report or score. You can see these on your credit report for a period of 12 months.

Each CRA has produced its own version of a notice that describes how the three main credit reference agencies, Equifax, Experian and TransUnion (formerly Callcredit), (also called “credit reference agencies” or “CRAs” in the notice), each use and share personal data. This personal data, also called ‘bureau data’, they receive, about you and/or your business, is part of, or derived from, or used, in credit activity.

The Equifax notice can be found at the following address: <https://www.equifax.co.uk/crain.html>

Data we receive

Criminal Records Checks

If Your application will include a criminal records check from Disclosure & Barring Service, please ensure You read the information on Your rights as an applicant of the Disclosure & Barring Service. This information is available at:

<https://www.gov.uk/government/publications/dbs-privacy-policies>

Disclosure & Barring Service will provide First Advantage with a result indicator. This will show as “Clear” or “See Paper Certificate”. We will also provide this information to the Requesting Organisation. Before You submit Your application, We will ask You to confirm that You are happy for Us to receive this information from the Disclosure & Barring Service.

For Basic checks - Where you have requested to receive the certificate, a paper certificate will be produced and sent via post to the address you provide in the application. Neither the Requesting Organisation, nor First Advantage will be able to see any of the conviction data, unless You decide to share this information with them by requesting the paper certificate is directed to them, or providing them with a copy of the paper certificate. Otherwise, they will see only the indicator result which will be displayed online.

For Standard and Enhanced checks - A paper certificate will be produced and sent via post to the address you provide in the application. Neither the Requesting Organisation, nor First Advantage will be able to see any of the conviction data, unless You decide to share this information with them by requesting the paper certificate is directed to them, or providing them with a copy of the paper certificate. Otherwise, they will see only the indicator result which will be displayed online.

If Your application will include a criminal records check from Disclosure Scotland, before You submit Your application, We will ask You to confirm that You are happy for Us to receive your certificate from Disclosure Scotland. We may provide a copy of this to the Requesting Organisation and retain a copy of the disclosure certificate until 6 months after completion

Data retention

First Advantage will keep a record of the application data and result of checks made as part of Our agreement with the Requesting Organisation for their audit purposes. Please see the table below for details of how long Your information will be held for.

Application status	Timescale (maximum)
Completed & submitted application	37 months
Incomplete or non-submitted applications	6 months

Your rights under GDPR or UK GDPR will depend on the reason the Requestor is carrying out the check and their lawful basis for processing Your data. You should contact them if You would like any information on the rights that are applicable to You for this check.

If you have any questions about how your personal data is used by First Advantage or you wish to exercise your rights by contacting us using the details set out in the 'Questions and Complaints' section in our EEA and UK Privacy Policy.

How to contact us

Our head office address is:

First Advantage Europe Ltd, No 1 Wilford Business Park, Ruddington Lane, West Bridgford, Nottingham NG11 7EP, United Kingdom

Company Registration Number: 03422709

Please contact Us if you have any questions about how your personal information is used by First Advantage, gdpr@fadv.com

If you have a complaint

If you believe that FIRST ADVANTAGE have not taken our responsibilities with your personal data seriously, you have the right to complain to the Supervisory Authority.

Their details are:

Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow Cheshire SK9 5AF

Telephone number: 0303 123 113 or 01625 545 745

Email: casework@ico.org.uk